

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
MIAMI DIVISION

MDL NO. 3076

CASE NO. 1:23-MD-03076-KMM

IN RE:

FTX Cryptocurrency Exchange Collapse Litigation

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THIS DOCUMENT RELATES TO ALL FTX  
CASES

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**PLAINTIFFS' REQUEST FOR STATUS CONFERENCE ON PENDING MATTERS**

Class Plaintiffs respectfully request the Court set a Status Conference, at the Court's earliest convenience. This MDL was created on June 5, 2023, and Class Counsel were appointed to help coordinate litigation to seek recovery for this massive financial disaster for victims across the country. Class Counsel conduct routine, informational meetings with thousands of class members, who all continue to suffer. Experts will testify that damages to the Class currently exceed \$10 billion dollars (after crediting all distributions from the FTX Estate). As a direct result of this Court's key rulings – including the Order on Promoter Track Motion to Dismiss [ECF No. 890] – and via coordinated efforts by the FTX Estate and the MDL, this MDL litigation has produced substantial recoveries for the Class.

Several significant issues are now fully briefed across various tracks of this MDL (including motions to dismiss) and await the Court's consideration. *See Exhibit A* (chart of some pending, fully briefed motions). These Motions raise overlapping legal issues and track-specific questions that could benefit from coordinated case management discussion.

Class Counsel were tasked to efficiently coordinate and prosecute this MDL Litigation and respectfully believe a Status Conference would help those efforts and allow the Parties to confer with the Court on: (1) the current docket of fully briefed motions across the various MDL tracks; (2) opportunities to streamline future motion practice and promote consistent treatment of recurring legal issues; and (3) procedural coordination and scheduling going forward. Given the scope and maturity of these pending issues, Class Plaintiffs respectfully suggest that active judicial involvement could meaningfully assist the Parties and promote its efficient resolution.

**WHEREFORE**, Class Counsel respectfully request a Status Conference to address pending motions, procedural coordination, and scheduling.

Dated: December 11, 2025    Respectfully submitted,

By: /s/ Adam Moskowitz

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**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the forgoing was filed on December 11, 2025, via the Court's CM/ECF system, which will send notification of such filing to all attorneys of record.

By: /s/ *Adam Moskowitz*

Adam Moskowitz